

EXHIBIT A

(State Court Documents)



Notice of Service of Process

LDD / ALL
Transmittal Number: 25927719
Date Processed: 11/21/2022

Primary Contact: Heather McClow
Lowe's Companies, Inc.
1000 Lowes Blvd
Mooresville, NC 28117-8520

Entity:	Lowe's Home Improvement, LLC Entity ID Number 2515370
Entity Served:	Lowe's Home Improvement
Title of Action:	Joseph Parsons vs. Lowe's Home Improvement
Matter Name/ID:	Joseph Parsons vs. Lowe's Home Improvement (13239649)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	York County Court of Common Pleas, SC
Case/Reference No:	2022-CP-46-03492
Jurisdiction Served:	South Carolina
Date Served on CSC:	11/18/2022
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Client Direct
Sender Information:	Joseph Parsons 803-322-1228

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

From: [Barr, Christy](#)
To: [Legal](#)
Subject: Civil Action
Date: Friday, November 18, 2022 3:27:07 PM
Attachments: [image2022-11-18-152333.pdf](#)
Outlook-Logo Desc.png

Please see attached paperwork. Customer dropped this off at the store.

Thank you,
Christy



|| Christy Barr

Store Manager | 1776 Lowe's Companies Inc.
Store: 803.684.1548

From: Lowes Document Scan <LexPrin@Lowe.com>
Sent: Friday, November 18, 2022 3:23 PM
To: Barr, Christy <christy.barr@store.lowes.com>
Subject: Scanned Document(s) Attached

Scanned Document(s) Attached

STATE OF SOUTH CAROLINA

COUNTY OF YORKJoseph Parsons

Plaintiff(s)

vs.

Lowe's Home Improvement

Defendant(s)

Submitted By: Joseph ParsonsAddress: 2150 Bailes Rd.YORK SC 29745

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2022-CP-46-03492

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

FILED-RECEIVED
2022 NOV 18 PM 3:08
DAVID HAMILTON
C.O.C.P. & C.S.
YORK COUNTY

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete.

- ☐ JURY TRIAL demanded in complaint. ☒ NON-JURY TRIAL demanded in complaint.
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is exempt from ADR. (Certificate Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|---|---|--|---|
| Contracts
<input type="checkbox"/> Constructions (100)
<input type="checkbox"/> Debt Collection (110)
<input type="checkbox"/> General (130)
<input type="checkbox"/> Breach of Contract (140)
<input type="checkbox"/> Fraud/Bad Faith (150)
<input type="checkbox"/> Failure to Deliver/Warranty (160)
<input type="checkbox"/> Employment Discrim (170)
<input type="checkbox"/> Employment (180)
<input type="checkbox"/> Other (199) _____
Inmate Petitions
<input type="checkbox"/> PCR (500)
<input type="checkbox"/> Mandamus (520)
<input type="checkbox"/> Habeas Corpus (530)
<input type="checkbox"/> Other (599) _____ | Torts - Professional Malpractice
<input type="checkbox"/> Dental Malpractice (200)
<input type="checkbox"/> Legal Malpractice (210)
<input type="checkbox"/> Medical Malpractice (220)
Previous Notice of Intent Case #
20 ____ -NI- ____ -
<input type="checkbox"/> Notice/ File Med Mal (230)
<input type="checkbox"/> Other (299) _____
Administrative Law/Relief
<input type="checkbox"/> Reinstatement License (800)
<input type="checkbox"/> Judicial Review (810)
<input type="checkbox"/> Relief (820)
<input type="checkbox"/> Permanent Injunction (830)
<input type="checkbox"/> Forfeiture-Petition (840)
<input type="checkbox"/> Forfeiture-Consent Order (850)
<input type="checkbox"/> Other (899) _____ | Torts - Personal Injury
<input type="checkbox"/> Conversion (310)
<input type="checkbox"/> Motor Vehicle Accident (320)
<input type="checkbox"/> Premises Liability (330)
<input type="checkbox"/> Products Liability (340)
<input checked="" type="checkbox"/> Personal Injury (350)
<input type="checkbox"/> Wrongful Death (360)
<input type="checkbox"/> Assault/Battery (370)
<input type="checkbox"/> Slander/Libel (380)
<input type="checkbox"/> Other (399) _____
Judgments/Settlements
<input type="checkbox"/> Death Settlement (700)
<input type="checkbox"/> Foreign Judgment (710)
<input type="checkbox"/> Magistrate's Judgment (720)
<input type="checkbox"/> Minor Settlement (730)
<input type="checkbox"/> Transcript Judgment (740)
<input type="checkbox"/> Lis Pendens (750)
<input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)
<input type="checkbox"/> Confession of Judgment (770)
<input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)
<input type="checkbox"/> Incapacitated Adult Settlement (790)
<input type="checkbox"/> Other (799) _____ | Real Property
<input type="checkbox"/> Claim & Delivery (400)
<input type="checkbox"/> Condemnation (410)
<input type="checkbox"/> Foreclosure (420)
<input type="checkbox"/> Mechanic's Lien (430)
<input type="checkbox"/> Partition (440)
<input type="checkbox"/> Possession (450)
<input type="checkbox"/> Building Code Violation (460)
<input type="checkbox"/> Other (499) _____
Appeals
<input type="checkbox"/> Arbitration (900)
<input type="checkbox"/> Magistrate-Civil (910)
<input type="checkbox"/> Magistrate-Criminal (920)
<input type="checkbox"/> Municipal (930)
<input type="checkbox"/> Probate Court (940)
<input type="checkbox"/> SCDOT (950)
<input type="checkbox"/> Worker's Comp (960)
<input type="checkbox"/> Zoning Board (970)
<input type="checkbox"/> Public Service Comm. (990)
<input type="checkbox"/> Employment Security Comm (991)
<input type="checkbox"/> Other (999) _____ |
|---|---|--|---|
- Special/Complex /Other**
☐ Environmental (600) ☐ Pharmaceuticals (630)
☐ Automobile Arb. (610) ☐ Unfair Trade Practices (640)
☐ Medical (620) ☐ Out-of State Depositions (650)
☐ Other (699) _____ ☐ Motion to Quash Subpoena in an Out-of-County Action (660)
☐ Sexual Predator (510) ☐ Pre-Suit Discovery (670)
☐ Permanent Restraining Order (680)
☐ Interpleader (690)
- Submitting Party Signature: Joseph Parsons

Date: 11-18-2022

STATE OF SOUTH CAROLINA,)
COUNTY OF YORK)
Joseph Parsons)
Plaintiff,)
vs.)
Lowe's Home Improvement)
Defendant.)

IN THE COURT OF COMMON PLEAS

SUMMONS

2022CP4603492

FILE NO.

FILED-RECEIVED
2022 NOV 18 PM 3:05
DAVID HAMILTON
C.O.P. & G.S.
YORK COUNTY, SC

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

, South Carolina.

Joseph Parsons
Plaintiff/Attorney for Plaintiff

Dated: 11-18-2022

Address:

2150 Bailes Rd
YORK SC 29745
803-322-1228

Statement of South Carolina

County of York

Joseph Parsons Plaintiff

VS.

Lowe's Home Improvement

Defendant

Complaint

2022CP4603492

FILED-RECEIVED
WS
2022 NOV 18 PM 3:05
DAVID HAMILTON
C.C.P. & GS
YORK COUNTY SC

Statement of Facts

① On November 20, 2019, Lowe's dumped a stack of wood over onto my leg, bending my knee backward and smashing my foot

② When the wood struck my knee, it burst my meniscus sack under my knee, made my foot turn yellow ~~and~~ and black, creating verrucose veins in my right leg

③ I went that day and had X-rays on my knee and foot

④ The doctor told me I had a knee of a twenty year old.

⑤ I walked three miles a day, every day, now I can't.

- ⑥ I have trouble getting up and down now, and now I walk with a limp.
- ⑦ I live now with constant pain in my right leg
- ⑧ When the manager went over to where I was injured I showed him that the forklift was not all the way under the wood and when they cut the band holding the wood together, it fell over on me.
- ⑨ The manager told me that they have extensions just for loads like that, that fit on the forklift, ~~but~~ but the operator had not used them, they were in a hurry, and that is why it fell on me.

- ⑩ The manager told me that day that they would pay for my hospital bills, because he knew it was there fault.
- ⑪ The doctor told me my knee needed surgery, and that it would take a long time to heal.
- ⑫ Howes has offered me 4,000.00 dollars, I didn't think that was fair, for what they had done to me.
- ⑬ I am suing for pain and suffering, negligents, and ~~unpaid~~ ~~unpaid~~ unpaid hospital bills.
- ⑭ Osha was never notified about the incident that I know of.

(15) I was not able to work for six weeks.

(16) Now I only work four hours a day and have to get off my leg.

(17) My knee cap ~~continues~~ continues to swell when I walk and builds up pressure under my knee.

(18) The incident happened at 1010 East Liberty St. York SC 29745 at Lowes, on Nov 19, 2019.

Joseph Parnis
2150 Bales Rd.
York SC 29745
803-322-1228